

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 1 – SUBREGION 34

AMERICAN MEDICAL RESPONSE OF	:	
CONNECTICUT, INC.	:	
	:	Case No. 01-CA-263985
<i>versus</i>	:	
	:	
INTERNATIONAL ASSOCIATION OF EMTS	:	
AND PARAMEDICS LOCAL R1-999,	:	
NAGE / SEIU LOCAL 5000	:	

RESPONDENT’S MOTION TO EXTEND HEARING DATE

As the Respondent in the above-captioned case, American Medical Response of Connecticut, Inc. (hereafter, the “Company”) hereby requests, by and through its Undersigned Counsel, that the hearing date in the above-captioned case be extended from December 16, 2020 to a future date to be determined. The Company’s request has been submitted to the Regional Director, insofar as more than twenty-one days remain before the scheduled hearing date. See Board’s Rules and Regulations, § 102.16(a)(5).

The Company seeks to extend the hearing date based upon the fact that, before the Notice of Hearing issued in the above-captioned case, the Undersigned was scheduled for hearing on December 16, 2020 in connection with an arbitration before the American Arbitration Association. Tyler Memorial Hospital vs. SEIU Healthcare Pennsylvania, AAA Case No. 01-18-0001-8150. The hearing in the

arbitration has previously been rescheduled on more than one occasion and relates to a notice of picketing that was now issued more than two years ago.

Apart from the fact the Undersigned was prescheduled for another hearing on the same day noticed for the hearing in the case at bar, the Undersigned will likely be unavailable for most of December due to surgery. The Undersigned developed an infection following a recent knee surgery. Due to the infection, the Undersigned was hospitalized from October 4, 2020 to October 12, 2020. During the course of the Undersigned's hospital stay, there was a need to debride the site of the previous surgical procedure. Consequently, the Undersigned was discharged with a large and deep wound on his leg that remains under the care of home health nurses and other healthcare providers.

The Undersigned had a need to go through another debridement procedure on October 30, 2020 and has been advised of the likely need for plastic reconstructive surgery. Because the wound is (literally) a moving target, no surgery has yet been scheduled, but as part of an examination performed by the Undersigned's plastic surgeon on November 6, 2020, the Undersigned was advised the reconstructive surgery would likely take place in December and, following the procedure, the Undersigned would be under various restrictions for roughly two weeks thereafter.

In summary, there is probability that the Undersigned will not be available for a hearing in December 2020, and in any event, should the Undersigned ultimately be available, he is prescheduled for the hearing in the arbitration mentioned above. The Undersigned brought these circumstances to the attention of Nate Smith, the Charging Party's representative, *via* e-mail on October 29, 2020 and requested that he advise on the Charging Party's position on the Company's intention to seek an extension of the hearing date. The Undersigned received no response from Mr. Smith. The Company would be available for a hearing on January 19, 20, 21 and / or 22, 2021 and would be happy to advise of further, future availability upon the request of the Regional Director or Division of Judges.

WHEREFORE, the Company respectfully requests that the hearing date be extended from December 16, 2020 to a future date to be determined.

Dated: Glastonbury, Connecticut
 November 9, 2020

Respectfully submitted,

/s/ _____

Bryan T. Carmody
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CERTIFICATE OF SERVICE

The Undersigned, Bryan T. Carmody, being an Attorney duly admitted to the practice of law, does hereby certify, pursuant to 28 U.S.C. § 1746, that, on November 9, 2020, the Respondent’s Motion to Extend Hearing Date was served upon the following *via* email:

Nate Smith, National Representative
International Association of EMTs and Paramedics Local R1-999, NAGE / SEIU
Local 5000
3510 Main Street
Bridgeport, CT 06606
nsmith@nage.org

Dated: Glastonbury, Connecticut
November 9, 2020

Respectfully submitted,

/s/ _____

Bryan T. Carmody
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